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February 28, 2022

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Law v. Estee Lauder Inc.*, No. 1:20-cv-04770-JMF (S.D.N.Y.)
Gandy v. Estee Lauder Inc., No. 1:20-cv-05779-JMF (S.D.N.Y.)

Dear Judge Furman:

Pursuant to the Court's Individual Practices in Civil Cases, Section 3(A), the Parties respectfully submit this joint letter motion to stay all proceedings pending private mediation of this ERISA class action.

On December 9, 2021, the Court adjourned the pretrial conference to April 7, 2022 and adopted the Parties' briefing schedule for Plaintiffs' Motion for Class Certification. (Dkt. 87.) On February 1, Plaintiffs filed their motion for class certification. Defendants' opposition is due April 1, 2022. The Parties have depositions scheduled in the coming weeks, and are engaged in ongoing document productions, retention of experts, etc.

On February 24, 2022 counsel for the Parties discussed interest in mediating the case and now have agreed to pursue private mediation with Robert Meyer, who has mediated numerous ERISA class actions, including these types of cases. To provide the Parties with sufficient time to prepare for mediation, analyze their positions, exchange voluminous damages-related data, and avoid the expenditure of significant costs associated with current deadlines, the Parties request that the Court stay this matter, including all deadlines, through and including Monday, May 30, 2022. The Parties will provide a report to the Court on that date informing the Court that the mediation was successful or, alternatively, requesting that the stay be lifted and proposing a new scheduling order.

Sincerely,

/s/ René E. Thorne

René E. Thorne

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cc: Mark K. Gyandoh, Esq. (via ECF)
Donald R. Reavey, Esq. (via ECF)
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Eric Lechtzin, Esq. (via ECF)
Howard Shapiro, Esq.
Todd H. Girshon, Esq.

Application GRANTED. The parties should not expect any extensions of the stay period. The Clerk of Court is directed to terminate ECF No. 95. SO ORDERED.

A handwritten signature in black ink, appearing to read "J. M. Jones", is written over the text "SO ORDERED".

March 2, 2022